# UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Criminal No. 13-66 RHKISER

UNITED STATES OF AMERICA,

**INDICTMENT** 

Plaintiff,

(18 U.S.C. § 2)

V.

(18 U.S.C. § 2421) (18 U.S.C. § 2422)

NAPOLEON NMN LONG, JR., a/k/a "Nate".

Defendant.

THE UNITED STATES GRAND JURY CHARGES THAT:

#### COUNT 1

(Interstate Travel to Engage in Prostitution)

In or about October 2011, in the State and District of Minnesota and elsewhere, the defendant,

## NAPOLEON NMN LONG, JR.,

a/k/a "Nate".

attempted to persuade, induce, entice and coerce any individual, namely, JANE DOE, to travel in interstate and foreign commerce to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense and persuaded, induced, enticed and coerced any individual, namely, JANE DOE, to travel in interstate and foreign commerce to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense, all in violation of Title 18, United States Code Sections 2 and 2422.

**SCANNED** 

APR 1 0 2013

U.S. DISTRICT COURT ST. PAUL

FILED 0 9 2013
RICHARD D. SLETTEN, CLERK
JUDGMENT ENTD
DEPUTY CLERK

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#### COUNT 2

(Transportation With Intent to Engage in Prostitution)

In or about October 2011, in the State and District of Minnesota, the defendant,

### NAPOLEON NMN LONG, JR.,

a/k/a "Nate",

aiding and abetting and being aided and abetted by others, knowingly attempted to transport any individual in interstate commerce, namely JANE DOE, and knowingly transported any individual in interstate commerce, namely JANE DOE, with the intent that JANE DOE engage in prostitution, or any sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Sections 2 and 2421.

A TRUE BILL		
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UNITED STATES ATTORNEY	FOREPERSON	